

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Wendy RAMIREZ-Martinez

Defendant.

Magistrate Case No.:


**07 MJ 8960**

COMPLAINT FOR VIOLATION OF  
21 U.S.C. § 952 and 960  
Importation of a Controlled Substance  
(Felony)

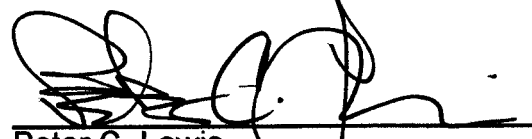
The undersigned complainant being duly sworn states:

That on or about December 4, 2007, within the Southern District of California, defendant Wendy RAMIREZ-Martinez did knowingly and intentionally import approximately 18.22 kilograms (40.08 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Chad N. Worgen, Special Agent  
U.S. Immigration and  
Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE THIS 5TH  
DAY OF DECEMBER 2007.

  
Peter C. Lewis  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Wendy RAMIREZ-Martinez

4 STATEMENT OF FACTS

5 This Statement of Facts is based on the reports, documents, and notes furnished to U.S.  
6 Immigration and Customs Enforcement Special Agent Chad N. Worgen.

7 On December 4, 2007, at approximately 1556 hours, Wendy RAMIREZ-Martinez  
8 attempted to enter the United States from the Republic of Mexico at the Calexico, California East  
9 Port of Entry. RAMIREZ was the driver and sole occupant of a 1997 Mercury Sable with  
10 California license plate number 3TXM371.

11 RAMIREZ gave a negative Customs declaration to Customs and Border Protection  
12 Officer E. Bosquet. During questioning, RAMIREZ stated that she was going shopping in  
13 Calexico, California. RAMIREZ stated that she was not the registered owner of the vehicle.  
14 RAMIREZ stated that her boyfriend was the owner of the vehicle, and he had purchased it two  
15 months prior. During cursory inspection, Officer Bosquet inspected the undercarriage of the  
16 vehicle, and he observed fresh mud splatter. Bosquet tapped the gas tank, and noticed that it  
17 sounded solid.

18 Officer Bosquet proceeded to escort RAMIREZ and the vehicle into the secondary lot for  
19 a more intensive inspection. In vehicle secondary, Canine Enforcement Officer J. Jones screened  
20 the vehicle with his Narcotics Human Detector Dog. Officer Jones informed Bosquet that his  
21 canine had alerted to the vehicle. After further inspection, Officer Bosquet discovered 18  
22 packages concealed within the gas tank. A package was probed producing a green leafy  
23 substance that tested positive for marijuana. The total weight of the packages was 18.22  
24 kilograms (40.08 pounds).

25 RAMIREZ was arrested for violation of United States Code 952 and 960, Importation of  
26 a Controlled Substance. RAMIREZ stated that she had knowledge that marijuana was to be  
27 concealed within the vehicle. RAMIREZ stated that she was aware that it is illegal to import  
28 marijuana into the United States. RAMIREZ stated that she was to take the vehicle to the closest  
29

1 gas station and wait for someone to pick up the vehicle. RAMIREZ stated that she was to be  
2 paid eight hundred dollars to complete the smuggling operation.